

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA)	
)	
PLAINTIFF,)	
)	
vs.)	
)	
33.92356 ACRES OF LAND,)	CIVIL ACTION NO. 98-1664 (CCC)
MORE OR LESS, SITUATED IN)	
VEGA BAJA, COMMONWEALTH OF)	
PUERTO RICO, AND JUAN PIZA-BLONDET,)	
AND ANY UNKNOWN OWNERS,)	
)	
DEFENDANTS.)	
_____)	

MOTION SUBMITTING EXHIBIT

Plaintiff, The United States of America, by and through its undersigned counsel, respectfully submits a copy of the Zoning Map of the Cuenca Hidrográfica, Laguna Tortuguero, Vega Baja, Puerto Rico on which parcels of land in issue are marked in color, with the following allegations.

1. On November 22, 2004, the Court ordered the government to produce a copy of its “Exhibit No. 6, ‘Mapa de Zonificación de Vega Baja,’ on which parcels of land in issue are marked in color.” The original of this Zoning Map was introduced into evidence as a government exhibit during the course of the “Larger Parcel” hearing held on October 26, 1999. It is the government’s understanding that the original document was filed with the court at the time of the hearing, and that in the same the parcels of land in issue were not marked in color.

2. With the lapse of several years, government former counsel David Lastra is no longer assigned to this matter. Two new attorneys have now been assigned as counsel in this matter. They are Paul Harrison and Jeffrey Tapick, both Trial Attorneys with the Land Acquisition Section, Environment and Natural Resources Division, U.S. Department of Justice in Washington, District of Columbia.

3. These two government attorneys traveled to Puerto Rico last week and have diligently searched for a copy of the requested Exhibit. Attempts to locate a copy of the 1999 Mapa de Zonificación de Vega Baja at the Puerto Rico Planning Board were not successful. The Planning Board only had the most recent version of this map which is dated 2001.

4. Notwithstanding all of the above, the government attorneys have obtained from their file a Zoning Map of the Cuenca Hidrográfica, Laguna Tortuguero, Vega Baja, Puerto Rico, and have marked in color the parcels of land in issue. The red color stands for the parcel of land that is the subject of the taking, including its right of way, and the blue color stands for the rest of the property or after parcel. Copy of this map is attached annexed to this motion and made part of the same by reference.

WHEREFORE, Plaintiff respectfully moves this Court to accept this map in compliance of its November 22, 2004 Order.

CERTIFICATE OF SERVICE

I hereby certify that, on this day a copy of the foregoing motion was faxed and mailed to Maurice V. Piza, 5500 Prytania Street, New Orleans LA 70115, Fax 504-277-2358.

Respectfully submitted, in San Juan, Puerto Rico, this 6th day of December, 2004.

H.S. GARCIA
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